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November 30, 2016

Via Electronic Delivery

Honorable Henry T. Wingate
United States District Court Judge
Southern District of Mississippi

RE: *Status of Outstanding Motions in Sunchase of Ridgeland, et al. v. City of Ridgeland, Mississippi, Civil Action No. 3:14-cv-938-HTW-LRA*

Dear Judge Wingate:

Per this Court's Order Returning Case to Active Docket [Dkt. No. 157] and the Court's instructions during the telephonic conference held between the parties and the Court on November 28, 2016, counsel for the Plaintiffs have reviewed the docket in this case and determined which motions are still live controversies.

Sunchase Case

Based on our review of the *Sunchase* docket, two outstanding motions remain live at this time. First, Plaintiffs filed a Motion for Declaratory and Injunctive Relief [Dkt. No. 43] and supporting Memorandum [Dkt. No. 44] on January 4, 2016. Defendant City of Ridgeland filed its Response in Opposition [Dkt. No. 71] and supporting Memorandum [Dkt. No. 72] on or about February 19, 2016. Plaintiffs filed their Rebuttal [Dkt. No. 101] on March 10, 2016. Plaintiffs believe this Motion has been fully briefed and is ripe for a ruling from this Court.

The only other outstanding motion is Plaintiffs' Motion to Exceed Briefing Page Limitation [Dkt. No. 100] as to its Rebuttal [Dkt. No. 101] referenced above. Defendant City of Ridgeland did not file a response in opposition to this Motion, so Plaintiffs respectfully request that the Court grant said Motion and accept Plaintiffs' Rebuttal.

BBC Baymeadows Case

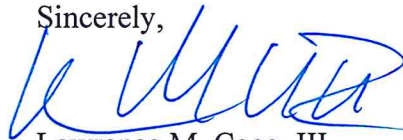
As this Court is aware, the instant case was consolidated for discovery purposes with *BBC Baymeadows, LLC v. City of Ridgeland, Mississippi*, Civil Action No. 3:14-cv-676-HTW-LRA. Plaintiffs have reviewed the docket in that case and believe that several discovery motions remain outstanding and are live controversies that directly affect the *Sunchase* case. However, Plaintiffs respectfully request that this Court hold such motions in abeyance until the Court has heard Defendant's Motion to Dismiss for Mootness (if such a Motion is filed) and Plaintiffs' Motion for Declaratory and Injunctive Relief in the

Sunchase case. Once the Court rules on the above Motions and adjudicates which claims will remain pending, the parties can determine which discovery motions would still affect the *Sunchase* case and can request rulings on such motions in conjunction with the entry of a new scheduling order.

Accordingly, Plaintiffs respectfully request that this Court consider the Motion for Declaratory and Injunctive Relief and the Motion to Exceed Briefing Page Limitation described herein as part of the active docket, and to set hearings on said Motions as necessary. If no such hearings are necessary, Plaintiffs request that this Court issue rulings on the above Motions at its earliest convenience.

If the Court has any questions or requires anything further, do not hesitate to contact me.

Sincerely,



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LLC and Jordan Ridge, LLC

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